

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JAMES M. PLASSE

Plaintiff,

vs.

**TYCO ELECTRONICS
CORPORATION,**

Defendant.

Civil Action No. 04-CV-30056-MAP

AFFIDAVIT OF INGRID S. MARTIN

I, Ingrid S. Martin , depose and state as follows:

1. I am counsel for Defendant Tyco Electronics Corporation ("TEC") in the above-captioned litigation. This Affidavit is offered in support of TEC's Application for Attorneys' Fees and Costs made in connection with the Court's September 7, 2006 Memorandum and Order Allowing TEC's Motion to Dismiss and For Sanctions.

2. I am an associate with the law firm of Clements & Clements, LLP in Boston, Massachusetts. Clements & Clements, LLP is a civil and criminal litigation firm.

3. I have been admitted to practice law in Massachusetts since 2002, and I am also admitted to practice before the United States District Court for the District of Massachusetts and the First Circuit Court of Appeals.

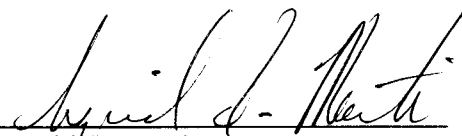
4. I am a graduate of Yale University (1997) and Harvard Law School (2001). After graduating from law school, from 2001 until 2003, I clerked for the Honorable George A. O'Toole of the United States District Court for the District of Massachusetts. From 2003 until 2005, I was an Assistant Attorney General with the Massachusetts Attorney General's Office in

the Corruption, Fraud, and Computer Crime Division. From 2005 to the present, I have been an associate at Clements & Clements, LLP.

5. Over the past five years, I have worked on complex civil litigation as well as white collar criminal investigations and prosecutions. I have represented clients in federal and state trial as well as appellate courts and have performed the full range of litigation activities, including discovery, depositions, motion practice, trial preparation, and appellate practice.

6. My current standard rate for new matters is \$275 per hour.

Signed under the pains and penalties of perjury.



Ingrid S. Martin

Dated: September 28, 2006